

Hearing Date: August 4, 2022 at 11:00 a.m.  
(prevailing Eastern Time)

Re: ECF No. 73

**MCDERMOTT WILL & EMERY LLP**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	
	)	Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,	)	
	)	Case No. 22-10943 (MEW)
Debtors. <sup>1</sup>	)	
	)	(Jointly Administered)
	)	
	)	

**STATEMENT OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS IN  
SUPPORT OF THE DEBTORS' MOTION FOR ENTRY OF AN ORDER (I)  
AUTHORIZING THE DEBTORS TO (A) HONOR WITHDRAWALS FROM THE MC  
FBO ACCOUNTS, (B) LIQUIDATE CRYPTOCURRENCY FROM CUSTOMER  
ACCOUNTS WITH A NEGATIVE BALANCE, (C) SWEEP CASH HELD IN THIRD-  
PARTY EXCHANGES, (D) CONDUCT ORDINARY COURSE RECONCILIATION  
OF CUSTOMER ACCOUNTS, AND (E) CONTINUE STAKING  
CRYPTOCURRENCY, AND (II) GRANTING RELATED RELIEF**

The Official Committee of Unsecured Creditors (the "Committee") appointed in the  
above-captioned chapter 11 cases (the "Chapter 11 Cases") of Voyager Digital Holdings,

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Voyager Digital Holdings, Inc.'s and Voyager Digital Ltd.'s principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003. Voyager Digital, LLC's principal place of business is 701 S. Miami Ave, 8<sup>th</sup> Floor, Miami, FL 33131.

Inc., *et al.* (collectively, the “Debtors”) hereby submits this statement in support of the *Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to (A) Honor Withdrawals from the MC FBO Accounts, (B) Liquidate Cryptocurrency from Customer Accounts with a Negative Balance, (C) Sweep Cash Held in Third-Party Exchanges, (D) Conduct Ordinary Course Reconciliation of Customer Accounts, and (E) Continue Staking Cryptocurrency, and (II) Granting Related Relief*[Docket No. 73] (as supplemented, the “FBO Motion”),<sup>2</sup> and respectfully states as follows:<sup>3</sup>

### **BACKGROUND**

1. On July 5, 2022 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

2. On July 19, 2022, the Office of the United States Trustee for the Southern District of New York (the “U.S. Trustee”) appointed the Committee pursuant to Bankruptcy Code section 1102. Docket No. 102. No request for the appointment of a trustee or examiner has been made in these Chapter 11 Cases.

3. On July 22, 2022, the Committee retained McDermott Will & Emery LLP as its counsel, and on July 25, 2022 the Committee retained FTI Consulting, Inc. as its financial advisor, both subject to Court approval.

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<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

<sup>3</sup> The Committee submits this statement solely with respect to the relief sought in the Motion regarding the distribution of funds from the MC FBO Accounts.

**STATEMENT**

4. Words cannot describe what many Voyager customers have faced since the company suspended withdrawals on July 1, 2022. This Court's docket and the Committee's professionals' inboxes are filled with stories that are both painful and difficult to reconcile.

5. The Committee's primary focus at this early stage is to mitigate customer and creditor hardships, while preserving causes of action that the Committee is hopeful will eventually make all creditors whole. Specifically, the Committee will advocate for the prompt return of all customer property to customers, as well as distributions of all remaining estate property, including cryptocurrency, as soon as possible in a manner that comports with the Bankruptcy Code. Although customers cannot be made whole today, the Debtors can and should begin down that path immediately and do everything possible to expedite these Chapter 11 Cases.

6. The relief sought by the Debtors in the Motion to distribute funds in the MC FBO Accounts to customers furthers the Committee's goals. However, the Committee is mindful of its fiduciary obligations to *all* creditors—not only customers, and not only customers who may have held cash in the MC FBO Accounts.

7. Over the last ten days, the Committee and its professionals have moved quickly to gain a complete understanding of the MC FBO Accounts and the Debtors' position that the funds therein are not property of the Debtors' estates. To scrutinize the Debtors' conclusions, the Committee undertook a two-step process.

8. First, the Committee analyzed whether a trust relationship was formed between the Debtors and customers that are owed funds from the MC FBO Accounts. Based on the Committee's review of documents produced by the Debtors, the Committee concluded that a trust relationship existed and that all relevant parties intended for the cash held in the

MC FBO Accounts to be held in trust for the Debtors' customers. Indeed, this is the precise purpose of an FBO account.

9. Second, the Committee sought confirmation that the Debtors' assets were not commingled with funds in the MC FBO Accounts. Given the substantial time and cost of conducting a forensic review of the MC FBO Accounts, the Committee requested that an officer of the Debtors with specific knowledge of the MC FBO Accounts affirmatively state in a declaration under penalty of perjury that no such commingling occurred. The Debtors filed such declaration on August 1, 2022.<sup>4</sup> The Committee has no basis to question the accuracy of such statement and does not believe that conducting a forensic review of every single transaction that occurred in the MC FBO Accounts since inception would be a prudent use of estate resources.

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<sup>4</sup> See Docket No. 192, ¶ 8 ("the Debtors have not borrowed funds from the MC FBO Accounts. Additionally, all cash movement from the MC FBO Accounts is approved by MC Bank following the daily reconciliation process. The Debtors do not and have not commingled their cash with the customer cash held in the MC FBO Accounts during the reconciliation process or otherwise. The cash held in the MC FBO Accounts for the benefit of customers is segregated from the Debtors' cash."). For the avoidance of doubt, the Committee is relying solely on paragraph 8 of the declaration for purposes of this statement.

10. For these reasons, the Committee fully supports the immediate distribution of all funds from the MC FBO Accounts to customers.

Dated: New York, New York  
August 2, 2022

**MCDERMOTT WILL & EMERY LLP**

/s/ Darren Azman

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*Proposed Counsel to the Official  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of August 2022, a true and correct copy of the foregoing *Statement of the Official Committee of Unsecured Creditors in Support of the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Honor Withdrawals from the MC FBO Accounts, (B) Liquidate Cryptocurrency from Customer Accounts with a Negative Balance, (C) Sweep Cash Held in Third-Party Exchanges, (D) Conduct Ordinary Course Reconciliation of Customer Accounts, and (E) Continue Staking Cryptocurrency, and (II) Granting Related Relief* has been served on the Master Service List via (i) electronic notification pursuant to the CM/ECF system for the United States Bankruptcy Court for the Southern District of New York, (ii) e-mail, or (iii) First Class U.S. Mail, as indicated in the service list attached hereto.

/s/ Darren Azman  
Darren Azman

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